

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

IN RE: Delores N Kee
Debtor(s)

CHAPTER 13
CASE NO. 20-60378

ATTORNEY FEE APPLICATION

Comes now the Debtor's Attorney, and makes application for additional Attorney's fees on the basis of the following information:

1. The Debtor(s) filed a bankruptcy petition before this Court on **March 2, 2020**, at which time the Debtor(s) executed a fee agreement whereby the Debtor's Attorney agreed to represent the Debtor for a set fee through confirmation. Specifically excluding other unanticipated litigation or motions.
2. That the Debtor(s) have requested that their Attorney file a Petition to incur debt, which said Petition had to be noticed to creditors and prepared for hearing.
3. That the Debtor(s) agree that their Attorney is due additional fees in the amount of **\$480.00** for the preparation of the Petition for the Petition to incur debt, Notice of Hearing and additional Attorney's Fee Application.

Therefore, the Debtor(s) and their Attorney hereby request the Court to enter an order confirming the additional Attorney's fees, and that said fees shall be paid by the Chapter 13 Trustee.

Dated: 06/08/23

Respectfully submitted,
Dolores N Kee
/s/ Stephen E. Dunn
Of Counsel

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IN RE: Delores N Kee
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NOTICE OF HEARING ON MOTION TO INCUR AND ATTORNEY FEE APPLICATION

Please take notice that Counsel for the above-named Debtor(s) filed a Motion to Incur Post Petition Debt (Reverse Mortgage) and Attorney Fee Application, true copies of which are attached hereto, and shall submit the same to the Honorable Rebecca B. Connelly, Bankruptcy Judge, for approval on July 12, 2023 at 9:30 am., or as soon thereafter as the parties may be heard by Video Conferencing URL: <https://www.zoomgov.com/j/1603692643>; Meeting Id: 160 369 2643.

Objections to the Motion to Incur Post Petition Debt (Reverse Mortgage) and Attorney Fee Application must be filed in writing, with copies thereof served on the Trustee and Counsel for the Debtor(s) more seven (7) days before the date of the hearing as set forth above. Any party wishing to object to the Motion to Incur Post Petition Debt (Reverse Mortgage) and the Attorney Fee Application described in the Motion must file a written response to the Motion with the Court and serve such objection upon the Court more than seven (7) days before the hearing date set forth above. The failure to file a response by this deadline may result in the Court treating the Motion as uncontested, entering an order granting the Motion prior to the hearing date and canceling the hearing described in this Notice.

I do hereby certify that a copy of this Notice and Motion have been sent to the Chapter 13 Trustee by ECF Mail, to the Debtor and all creditors by first class postage prepaid mail in this case on the after mentioned date.

Dated: 06/08/23

Respectfully submitted,
Dolores N Kee
/s/ Stephen E. Dunn
Of Counsel

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